REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Initially, applicants acknowledge consideration of the Information Disclosure Statements of September 24, 2001 to June 6, 2003. However, applicants note that with respect to the Information Disclosure Statement filed September 24, 2001, the Office Action appears to have inadvertently not initialed reference AW cited on that IDS under the "Other References" section. Applicants respectfully request that reference also be acknowledged as considered.

The specification is amended by the present response to correct minor grammatical and idiomatic informalities. The changes made to the specification are deemed to be self-evident from the original disclosure, and thus not raise any issues of new matter.

Claims 1 and 21-29 are pending in this application. Claim 1 is amended by the present response, claims 2-20 are canceled without prejudice, and new claims 21-39 are presented for examination.

Claims 1-10 were rejected under 35 U.S.C. § 101. Claims 1, 2, 4-7, 10-12, 14-17, and 20 were rejected under 35 U.S.C. § 112, second paragraph. Claims 1-20 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. patent 5,806,058 to Mori et al. (herein "Mori") in view of U.S. Patent Application Publication 2002/0065815 to Layden.

Addressing first the rejection of claims 1-10 under 35 U.S.C. § 101, that rejection is traversed by the present response. Independent claim 1 is directed to a data management method with specific operations. Applicants respectfully submit such subject matter is clearly a method or process, which is a proper statutory class. It is unclear on what basis the outstanding rejection even indicates such subject matter is not statutory. Claim 1 is clearly directed to a data management method that has a concrete, useful, and tangible result of managing data. Such subject matter is clearly statutory.

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Addressing now the rejection of claims 1, 2, 4-7, 10-12, 14-17, and 20 under

35 U.S.C. § 112, second paragraph. That rejection is traversed by the present response.

Claim 1 is amended by the present response to clarify features recited therein. The

other rejected claims are canceled by the present response, and new claims 21-39 have been

written to recite more clear language. The claims still recite certain "nested levels", but that

is not believed to be improper or unclear. The pending claims are believed to be in full

compliance with all requirements under 35 U.S.C. § 112, second paragraph.

Addressing now the rejection of claims 1-20 under 35 U.S.C. § 103(a) as unpatentable

over Mori in view of Layden, that rejection is traversed by the present response.

Initially, applicants note independent claim 1 is amended by the present response to

clarify features recited therein, and to specifically be more clearly directed to:

> A data management method for managing data having an instance
> of a unit of data, the instance comprising a cell and a façade, the cell
> comprising managed data, the facades comprising rows indicating
> correlation among a plurality of instances, the data being logically
> arranged by a lexicon, pointers to the instances being formed in a context,
> the instances storing the data in a data retrieval pattern, and addresses of
> the data retrieval pattern being stored in the context and the rows and the
> relationships...

Such features as clarified in independent claim 1 are clear from the original specification, for

example in Figures 2-4 and the corresponding description thereto.

Neither of the applied art to Mori nor Laden teaches or suggests a specific claimed

structure of the data being managed.

Moreover, independent claim 1 further recites the data management method

comprises operations of:

> assigning different facades to each of a plurality of storage regions
> that are discriminated from each other by their addresses:
> forming rows corresponding to the context, the context containing
> address values referring to the storage regions, so that the rows are
> homologized to each of the address values contained in the context;

          registering the rows in the facades assigned to the storage regions
that are designated by the address values corresponding to the rows.

Such operations in the claimed invention result in a data management system as claimed that can enlarge a database flexibly and efficiently without halting services to applications systems even when data types different from those that are first assumed to be required after the database has been constructed and services to the application system have been started.[1] Neither Mori nor Layden teach or suggest such operations.
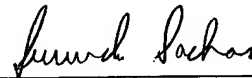
In such ways, amended independent claim 1, and the claims dependent therefrom, patentably distinguish over Mori in view of Layden.

Further, new independent claim 30 is specifically directed to a computer readable storage medium including executable data management program instructions for managing data. Independent claim 30 recites similar features as in independent claim 1 noted above, and thus new independent claim 30, and the claims dependent therefrom, are also believed to be allowable.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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[1] See for example the present specification at page 3, lines 22-29.